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Hearing Date: July 27, 2016

Hearing Time: 10:00 a.m.

Objection Date: July 20, 2016

*Attorneys for Defendants on Exhibit A annexed
hereto*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION

CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A
TO NOTICE OF MOTION

Defendants.

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel to Defendants on Exhibit A to the Notice of Motion (“Defendants”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in support of Defendants’ motion for an order authorizing the deposition of Bernard L. Madoff pursuant to Fed. R. Civ. P. 30(a)(2)(B).

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Transcript of Proceedings held on June 20, 2016, before Hon. Stuart M. Bernstein, United States Bankruptcy Court, Southern District of New York.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the Transcript of Proceedings held on May 17, 2016, before Hon. Stuart M. Bernstein, United States Bankruptcy Court, Southern District of New York.

5. Attached hereto as **Exhibit C** is a true and accurate copy of the Transcript of Proceedings held on February 24, 2016, before Hon. Stuart M. Bernstein, United States Bankruptcy Court, Southern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 7, 2016

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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*Attorneys for the Defendants listed on
Exhibit A to Notice of Motion*